

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

CHRISTOPHER BLAKE and JAMES ORKIS,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

JPMORGAN CHASE BANK, N.A., CHASE
BANK USA, N.A., JPMORGAN CHASE &
CO., and CROSS COUNTRY INSURANCE
COMPANY,

Defendants.

Civil Action No. 5:13-cv-06433

Oral argument requested

DEFENDANTS' MOTION TO DISMISS AMENDED COMPLAINT

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), Defendants

JPMorgan Chase Bank, N.A., Chase Bank USA, N.A., JPMorgan Chase & Co, and Cross
Country Insurance Company (“Defendants”) respectfully move the Court for an order dismissing
Plaintiffs’ claims with prejudice. The grounds for Defendants’ Motion to Dismiss are set forth in
the accompanying Memorandum of Law. A Proposed Order also is attached.

Respectfully Submitted

By: /s/

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Company.*